

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,)
v.)
Plaintiff,)
)
BLUE CROSS BLUE SHIELD OF) CIVIL ACTION NO:
MASSACHUSETTS, INC., BLUE CROSS) NO: 05-CV-10448-GAO
BLUE SHIELD LONG-TERM)
DISABILITY BENEFIT PLAN, a/k/a)
OMNIBUS WELFARE BENEFITS)
PLAN, KEMPER NATIONAL)
SERVICES, INC., BROADSPIRE)
SERVICES, INC., AND SHELDON)
MYERSON, MD.,)
)
Defendants.)
)

MOTION TO ADMIT ATTORNEY *PRO HAC VICE*

Pursuant to Local Rule 83.5.3 and the attached Affidavit and Certificate of Good Standing, the undersigned counsel moves the admission *pro hac vice* of David F. Schmidt Esquire (the "Admittee"), of the law firm of Chittenden, Murday & Novotny LLC, 303 W Madison Street, Suite 1400, Chicago, Illinois 60606. The Admittee will be representing the following defendants: Blue Cross Blue Shield Long-Term Disability Benefit Plan, a/k/a Omnibus Welfare Benefits Plan, Kemper National Services, Inc., Broadspire Services, Inc. and Sheldon Myerson, M.D. in the above-entitled case.

Plaintiff's counsel Bernard A. Kansky has advised the undersigned that he has no opposition to this motion.

Respectfully submitted,

DATED: September 26, 2005

E. S. Rooney Jr.
Edward S. Rooney, Jr.
BBO No. 426840
ECKERT SEAMANS CHERIN
& MELLOTT, LLC
One International Place, 18th Floor
Boston, MA 02110
(617) 342-6800

OF COUNSEL:

David F. Schmidt
CHITTENDEN, MURDAY & NOVOTNY LLC
303 West Madison Street, Suite 1400
Chicago, IL 60606
312-281-3600

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by regular mail this 26th day of September, 2005.

E. S. Rooney Jr.
Edward S. Rooney, Jr.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

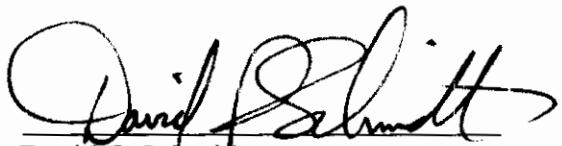
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MYERSON, M.D.,)
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AFFIDAVIT

I, David F. Schmidt, being first duly sworn and under oath state that I am fully familiar with the facts set forth herein, and would competently and truthfully testify the same if called upon to do so at deposition or at trial.

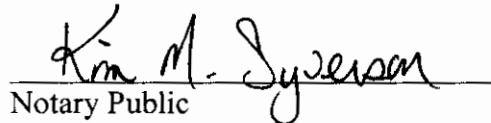
1. My name is David F. Schmidt.
2. I am admitted to practice before the Supreme Court of the State of Illinois, District Courts for Northern, Central and Southern Districts of Illinois, the Northern and Southern Districts of Indiana, the Northern, Eastern and Southern Districts of Texas and the Eastern District of Michigan and the Courts of Appeal for the Sixth, Seventh and Eleventh Circuits.
3. I am a member in good standing in every jurisdiction where I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.



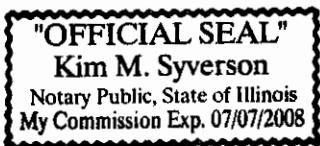
David F. Schmidt

Subscribed and sworn to before me
this 20th day of September, 2005.



Kim M. Syverson

Notary Public





Certificate of Good Standing

United States District Court for the Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court for the Northern District of Illinois, do hereby certify that

David Faulkner Schmidt

was duly admitted to practice in this Court on December 20, 1990

and is currently in good standing as a member of the bar of this Court

Dated at Chicago on
August 9, 2005

Michael W. Dobbins, Clerk of Court
Esperanza Arnold
by Esperanza Arnold
Deputy Clerk